U.S. Patent No. 7,885,981 – Joint Claim Terms Chart Pursuant to LPR 11

	Disputed Claim Language	Asserted Claim(s)	Plaintiff's Proposed Construction	Defendant's Proposed Construction
[1]	wherein said relational database may be of any arbitrary size or complexity,	All	The schema, rather than the data within the database, may be of any arbitrary size or complexity D.I. 33 at 5, § 1.5; 38 § 4.5; 41 § 5.4.	The claim term lacks support in the specification, otherwise, plain and ordinary meaning. Microsoft Corporation's Invalidity Contentions § III.B, Exs. 1-8 at 1.[p], 4.[p], 5.[p].
[2]	automatically generating	All	The "generating" - comprising steps (a), (b), and (c) - is carried out upon being triggered by a user, without requiring further intervention by the user in order to complete the generation of the UI. D.I. 33 at 4, §§ 1.2; 38 § 4.2; 41 § 5.2.	Plain and ordinary meaning. Microsoft Corporation's Invalidity Contentions, Exs. 1-8 at 1.[p], 4.[p], 5.[p].
[3]	" … defining a user interface paradigm comprising a set of modes for interacting with a given database table, said modes comprising create, retrieve, update and delete, and a corresponding display format for each mode"	All	For each of the specified modes of operation (create, retrieve, update and delete), the generated UI includes among its provided display formats at least one display format which supports that operation.	" . . . defining a set of distinct user interfaces comprising a screen or window for each of the operations of creating, retrieving, updating, and deleting data in a given database table"

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			D.I. 33 at 5-9, §§ 1.7-1.9; 39 §§ 4.7-4.9; 41 §§ 5.5-5.7.	Microsoft Corporation's Invalidity Contentions, Exs. 1-8 at 1.[a], 4.[a], 5.[a].
[4]	"... integrates into each said mode display processes for representing, navigating, and managing said relationships across tables, for selecting among said modes, and for navigating across said tables and interacting in accordance the selected mode with the data in the tables that are reached by said navigation, while observing and enforcing relational interdependencies among data across said tables"	All	Integrates into each said mode display one or more processes for representing, navigating, and managing said relationships across tables, selecting among said modes for tables reached by said navigation, and interacting in accordance with the selected mode with the data in the tables that are reached by said navigation, while observing and enforcing relational interdependencies among data across said tables. The mode displays, taken together, provide the full complement of such processes. D.I. 33 at 11-21, §§ 1.15-1.16; 40 §§ 4.15-4.16; 42 §§ 5.13-5.14.	". . . integrates into each distinct user interface comprising a screen or window processes for (1) representing, (2) navigating, and (3) defining the relationship between one table and another; for selecting among the user interfaces; and for navigating across said tables and interacting according with the selected user interface with the data in the tables that are reached by said navigation, while obse1ving and enforcing relational interdependencies among data across said tables" Microsoft Corporation's Invalidity Contentions, Exs. 1-8 at 1.[d.iii], 4.[d.iii], 5.[d.iii].
[5]	representing ... said relationships across tables …	All	Visually representing at least the existence of a relationship from the data record(s) in the table being viewed to the corresponding data in another table (if any) that is related to the viewed-table data record(s),	Plain and ordinary meaning, consistent with the above construction, i.e., "representing . . . the relationship between one table and another"

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			according to the data model for the database. D.I. 33 at 11-20, § 1.15; 40 § 4.15; 42 § 5.13.	Microsoft Corporation's Invalidity Contentions, Exs. 1-8 at 1.[d.iii], 4.[d.iii], 5.[d.iii].
[6]	navigating ... said relationships across tables	All	For the visually represented cross-table relationships, navigating from the data in the viewed table to a display of the data in a related table that is specifically related to the viewed-table data record. D.I. 33 at 11-20, § 1.15; 40 § 4.15; 42 § 5.13.	Plain and ordinary meaning, consistent with the above construction, i.e., "navigating . . . the relationship between one table and another" Microsoft Corporation's Invalidity Contentions, Exs. 1-8 at 1.[d.iii], 4.[d.iii], 5.[d.iii].
[7]	managing ... said relationships across tables …	All	Managing the relationships of records in a given table with corresponding records in a related table, for example, by way of a dropdown that limits selection of an added or edited value for a record in the given table to the permissible values as exist within the records of the related table. D.I. 33 at 11-20, § 1.15; 40 § 4.15; 42 § 5.13.	Plain and ordinary meaning, consistent with the above construction, i.e., "defining the relationship between one table and another" or "creating, revising, or manipulating a definition that specifies how one table is related to another"

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				Microsoft Corporation's Invalidity Contentions, Exs. 1-8 at 1.[d.iii], 4.[d.iii], 5.[d.iii].
[8]	while observing and enforcing relational interdependencies among data across said tables	All	All stated navigation, management, and interaction is carried out consistent with, and preventing violation of, all cross-table interdependencies, e.g., so as to preserve the referential integrity of the relational database. D.I. 33 at 21, § 1.16; 40 § 4.16; 42 § 5.14.	Plain and ordinary meaning. Microsoft Corporation's Invalidity Contentions, Exs. 1-8 at 1.[d.iii], 4.[d.iii], 5.[d.iii].
[9]	"providing an output stream from said server, for user display and input devices, defining a user interface paradigm comprising a set of modes for interacting with a given database table, said modes comprising create, retrieve, update and delete, and a corresponding display format for each mode"	1	Plain meaning; otherwise portions should be construed as stated above.	The function of this limitation is defined by the claim language, including the claim language as construed above, for which there is no corresponding structure in the patent. Since there is no corresponding structure for the full breadth of this function, it is indefinite. Microsoft Corporation's Invalidity Contentions § III.A.
[10]	"causing said server to scan said database and apply a body of rules	1	Plain meaning.	The function of this limitation is defined by the claim language, for

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to determine the table structures, constraints and relationships of said data model, and store representations thereof in machine-readable media accessible to said server"			which there is no corresponding structure in the patent. Since there is no corresponding structure for the full breadth of this function, it is indefinite. Microsoft Corporation's Invalidity Contentions § III.A.
[11] "causing said server to use said representations to construct a corresponding client application for access through said user display and input devices, wherein said client application provides a connection to said database, provides displays of the table contents of said database for each of said modes in accordance with the display formats of said paradigm, integrates into each said mode display processes for representing, navigating, and managing said relationships across tables, for selecting among said modes, and for navigating across said tables and interacting in accordance the selected mode with the data in the tables that are reached by said navigation, while observing and enforcing relational	1	Plain meaning; otherwise portions should be construed as stated above.	The function of this limitation is defined by the claim language, including the claim language as construed above, for which there is no corresponding structure in the patent. Since there is no corresponding structure for the full breadth of this function, it is indefinite. Microsoft Corporation's Invalidity Contentions § III.A.

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	interdependencies among data across said tables"			
[12]	"machine-readable routines to provide an output stream for user display and input devices, defining a user interface paradigm comprising a set of modes for interacting with a given database table, said modes comprising create, retrieve, update and delete, and a corresponding display format for each mode"	4	See claim 1. Plaintiff interprets Defendant's proposal as a request to construe in accordance with 35 U.S.C. § 112(6), but this is improper because the claim language provides adequate structure and the claim should not be construed pursuant to 35 U.S.C. § 112(6).	The language "machine-readable routines to" is a form of means-plus-function language. The function of this limitation is defined by the claim language, including the claim language as construed above, for which there is no corresponding structure in the patent. Since there is no corresponding structure for the full breadth of this function, it is indefinite. Microsoft Corporation's Invalidity Contentions § III.A.
[13]	"machine-readable routines for scanning said database and applying a body of rules to determine the table structures, constraints and relationships of said data model, and for storing representations thereof"	4	Plain meaning. Plaintiff interprets Defendant's proposal as a request to construe in accordance with 35 U.S.C. § 112(6), but this is improper because the claim language provides adequate structure and the claim should not be construed pursuant to 35 U.S.C. § 112(6).	The language "machine-readable routines to" is a form of means-plus-function language. The function of this limitation is defined by the claim language, for which there is no corresponding structure in the patent. Since there is no corresponding structure for the full breadth of this function, it is indefinite.

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			Microsoft Corporation's Invalidity Contentions § III.A.
[14] "machine-readable routines for using said representations to construct a corresponding client application, wherein said client application provides a connection to said database, provides displays of the table contents of said database for each of said modes in accordance with the display formats of said paradigm, integrates into each said mode display processes for representing, navigating, and managing said relationships across tables, for selecting among said modes, and for navigating across said tables and interacting in accordance the selected mode with the data in the tables that are reached by said navigation, while observing and enforcing relational interdependencies among data across said tables"	4	Plain meaning; otherwise portions should be construed as stated with regard to claim 1. Plaintiff interprets Defendant's proposal as a request to construe in accordance with 35 U.S.C. § 112(6), but this is improper because the claim language provides adequate structure and the claim should not be construed pursuant to 35 U.S.C. § 112(6).	The language "machine-readable routines to" is a form of means-plus-function language. The function of this limitation is defined by the claim language, including the claim language as construed above, for which there is no corresponding structure in the patent. Since there is no corresponding structure for the full breadth of this function, it is indefinite. Microsoft Corporation's Invalidity Contentions § III.A.
[15] "a routine for providing a user interface paradigm comprising a set of modes for interacting with a given database table, said modes comprising create, retrieve, update	5	Plain meaning; otherwise portions should be construed as stated with regard to claim 1. Plaintiff interprets Defendant's proposal as a request to construe in accordance with 35	The language "a routine for" is a form of means-plus-function language. The function of this limitation is defined by the claim language, including the claim

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and delete, and a corresponding display format for each mode"		U.S.C. § 112(6), but this is improper because the claim language provides adequate structure and the claim should not be construed pursuant to 35 U.S.C. § 112(6).	language as construed above, for which there is no corresponding structure in the patent. Since there is no corresponding structure for the full breadth of this function, it is indefinite. Microsoft Corporation's Invalidity Contentions § III.A.
[16] "a routine for scanning said database and applying a body of rules to determine the table structures, constraints and relationships of said data model, and for storing representations thereof"	5	Plain meaning. Plaintiff interprets Defendant's proposal as a request to construe in accordance with 35 U.S.C. § 112(6), but this is improper because the claim language provides adequate structure and the claim should not be construed pursuant to 35 U.S.C. § 112(6).	The language "a routine for" is a form of means-plus-function language. The function of this limitation is defined by the claim language, for which there is no corresponding structure in the patent. Since there is no corresponding structure for the full breadth of this function, it is indefinite. Microsoft Corporation's Invalidity Contentions § III.A.
[17] "a routine for using said representations to construct a corresponding client application, wherein said client application provides a connection to said database, provides displays of the	5	Plain meaning; otherwise portions should be construed as stated with regard to claim 1. Plaintiff interprets Defendant's proposal as a request to construe in accordance with 35 U.S.C. § 112(6), but this is	The language "a routine for" is a form of means-plus-function language. The function of this limitation is defined by the claim language, including the claim language as construed above, for

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table contents of said database for each of said modes in accordance with the display formats of said paradigm, integrates into each said mode display processes for representing, navigating, and managing said relationships across tables, for selecting among said modes, and for navigating across said tables and interacting in accordance the selected mode with the data in the tables that are reached by said navigation, while observing and enforcing relational interdependencies among data across said tables"		improper because the claim language provides adequate structure and the claim should not be construed pursuant to 35 U.S.C. § 112(6).	which there is no corresponding structure in the patent. Since there is no corresponding stmch1re for the full breadth of this function, it is indefinite. Microsoft Corporation's Invalidity Contentions § III.A.